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September 25, 2023

VIA ECF

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse, Courtroom 618
40 Foley Square
New York, NY 10007

LETTER MOTION FOR ENTRY OF INTERIM CONSENT ORDER

Re: *Sophie Belinda Turner v. Joseph Adam Jonas*
Case No. 1:23-cv-08349-KPF

Dear Judge Failla:

This case is before the Court on the Verified Petition for Return of Children to England (the “Petition”) (Doc. No. 1) filed by the Petitioner, Sophie Belinda Turner (the “Mother”). The responsive pleading of the Respondent, Joseph Adam Jonas (the “Father”) is not yet due. The case is scheduled for an initial pretrial conference on October 3, 2023.

The parties have agreed to the entry of the attached proposed Interim Consent Order, without prejudice to either party’s claims and defenses, prohibiting the removal of the parties’ children from the jurisdictions of the United States District Courts for the Southern & Eastern Districts of New York pending further order of this Court. This Court has the authority, in furtherance of article 7(b) of the Hague Convention to “. . . take or cause to be taken measures under Federal or State law, as appropriate, to protect the well-being of the child involved or to prevent the child’s further removal or concealment before the final disposition of the petition.” 22 U.S.C. § 9004(a); *see also* Hague Convention, art. 7(a). The Mother therefore respectfully requests that the Court enter the proposed Interim Consent Order submitted herewith.

Respectfully,

/s/ Kelly A. Powers
Stephen J. Cullen, *Pro Hac Vice*
Kelly A. Powers, *Pro Hac Vice Pending*
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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of September, 2023, a copy of the foregoing Letter Motion for Entry of Interim Consent Order was electronically filed and that it is available to all counsel of record for viewing and downloading from the ECF system.

/s/ Kelly A. Powers
Kelly A. Powers, *Pro Hac Vice Pending*